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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LIANA KARAPETYAN,

15 Defendant.
16

2:21-CR-00050-TLN

APPLICATION AND ORDER FOR
MONEY JUDGMENT

17 On or about April 22, 2021, defendant Liana Karapetyan entered a guilty plea to conspiracy to
18 commit health care fraud in violation of 18 U.S.C. § 1349 (Count One) and conspiracy to pay and
19 receive health care kickbacks in violation of 18 U.S.C. § 371 (Count Two), as charged in the
20 Information.

21 As part of her plea agreement with the United States, defendant Liana Karapetyan agreed to
22 forfeit voluntarily and immediately \$2,075,000, as a personal money judgment pursuant to Fed. R. Crim.
23 P. 32.2(b)(1), which reflects a reasonable compromise between the parties for forfeiture purposes
24 concerning the proceeds the defendant obtained as a result of violations of 18 U.S.C. §§ 371 and 1349 to
25 which she has pled guilty. See Defendant Karapetyan's Plea Agreement ¶ II.F. Plaintiff hereby applies
26 for entry of a money judgment as follows:

27 1. Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(7), 28 U.S.C. § 2461(c), and Fed. R.
28 Crim. P. 32.2(b)(1), the Court shall impose a personal forfeiture money judgment against defendant

1 Liana Karapetyan in the amount of \$2,075,000.

2 2. The above-referenced personal forfeiture money judgment is imposed based on defendant
3 Liana Karapetyan's convictions for violating 18 U.S.C. §§ 371 and 1349 (Counts One and Two). Said
4 amount reflects a reasonable compromise between the parties for forfeiture purposes concerning the
5 proceeds the defendant obtained, which the defendant agreed is subject to forfeiture based on the
6 offenses of conviction. Any funds applied towards such judgment shall be forfeited to the United States
7 of America and disposed of as provided for by law.

8 3. Payment of the personal forfeiture money judgment should be made in the form of a
9 cashier's check made payable to the U.S. Marshals Service, and sent to the U.S. Attorney's Office, Attn:
10 Asset Forfeiture Unit, 501 I Street, Suite 10-100, Sacramento, CA 95814. An initial payment of at least
11 \$20,000 is due on or before the date of sentencing. Prior to the imposition of sentence, any funds
12 delivered to the United States to satisfy the personal money judgment shall be seized and held by the
13 U.S. Marshals Service, in its secure custody and control. Any funds paid to victims through restoration
14 or remission shall be credited to the defendant's restitution obligation.

15 DATED: 5/26/2021

PHILLIP A. TALBERT
Acting United States Attorney

17 /s/ Matthew Thuesen
18 MATTHEW THUESEN
Assistant U.S. Attorney

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Any funds applied towards such judgment shall be forfeited to the United States of America and disposed of as provided for by law. Prior to the imposition of sentence, any funds delivered to the United States to satisfy the personal money judgment shall be seized and held by the U.S. Marshals Service, in its secure custody and control. Any funds paid to victims through restoration or remission shall be credited to the defendant's restitution obligation.

DATED: June 1, 2021

Troy L. Nunley
United States District Judge